

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

PFIZER INC. ERISA LITIGATION

Case No. 04 CV 10071 (RO)

AFFIDAVIT OF JASON M. HALPER

STATE OF NEW YORK)

)

ss:

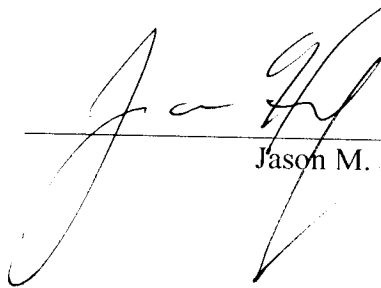
COUNTY OF NEW YORK)

JASON M. HALPER, being duly sworn, deposes and says:

1. I am a member of the Bar of the State of New York and of the firm Cadwalader, Wickersham & Taft LLP, counsel to Defendants Henry A. McKinnell, M. Anthony Burns, Robert N. Burt, W. Don Cornwell, William H. Gray III, Constance J. Horner, William R. Howell, Stanley O. Ikenberry, George A. Lorch, Dana G. Mead, Franklin D. Raines, Ruth J. Simmons, William C. Steere, Jr., Michael S. Brown, Jean-Paul Vallès, David L. Shedlarz, Tim Cowley, Carlos H. del Rio, Alan G. Levin, Sylvia Montero, Rene Morales, Richard Passov, Louis Prado, M. P. Tarnok, Sharon A. Kinsman, Frank C. Carlucci, Fred Hassan, Steven McMillan, M. Kathryn Eickhoff, William U. Parfet, Teresa M. Holland, William J. Robison, Barry Westgate, Alexandra van Horne and Robert Thompson (collectively, the “Individual Defendants”), Pharmacia Corporation (“Pharmacia”) and Pfizer Inc. (“Pfizer,” and together with the Individual Defendants and Pharmacia, “Defendants”). I submit this affidavit in support of Defendants’ motion to dismiss the Consolidated Class Action Complaint For Violations of The Employee Retirement Income Security Act (the “Complaint”).

2. Attached hereto as Exhibits A-D are true and correct copies of the following documents:

- A. The Consolidated Class Action Complaint For Violations of The Employee Retirement Income Security Act, dated June 5, 2006.
- B. Pfizer Report on Form 10-K, dated, December 31, 2005.
- C. Pfizer Report on Form 10-K, dated, December 31, 2002.
- D. Pharmacia Report on Form 10-K, dated, December 31, 2002.



Jason M. Halper

Sworn to before me this
29th day of September, 2006



Notary Public

VANESSA PAGNANI
Notary Public, State of New York
No. 01PA6100940
Qualified in Westchester County
Commission Expires Nov. 3, 2007